

From: [Barbara Nann](#)
To: [Garyg Miller](#); [Barbara Aldridge](#)
Subject: Fw: Gulfco UAO Notice of Intent to Comply
Date: 02/07/2008 10:00 AM

FYI

Barbara A. Nann
Assistant Regional Counsel
EPA Region 6 (6RC-S)
1445 Ross Avenue
Dallas, TX 75202
phone: (214) 665-2157
fax: (214) 665-6460
nann.barbara@epa.gov

----- Forwarded by Barbara Nann/R6/USEPA/US on 02/07/2008 10:00 AM -----

"Eldridge, John"
<John.Eldridge@haynesboone.com>

To: Barbara Nann/R6/USEPA/US@EPA
cc

02/06/2008 04:25 PM

Subject: RE: Gulfco UAO Notice of Intent to Comply

Thanks, Barbara. I want to make sure my request for additional time to respond to the UAO is clear. Given that Parker was not given a chance to negotiate an AOC per Section 122(e), the delays we have had gaining an understanding of what role Parker would be asked to play given the ongoing UAO work, and the possibility that the UAO would be replaced with an AOC, we requested a new notice of intent to comply date under Art X of the UAO. While Parker may choose to identify and assert its sufficient cause defenses, it may also decide to comply. Parker has been diligently working towards the above objectives, and I will send a letter to that effect. My understanding is that moving the notice date would require a new UAO, so you have suggested that Parker send a letter. This arrangement will give Parker comfort that EPA will not pursue non-compliance penalties until we have had an opportunity to gather the information we need (or until some agreed date). Regards, John Eldridge

-----Original Message-----

From: Nann.Barbara@epamail.epa.gov [<mailto:Nann.Barbara@epamail.epa.gov>]

Sent: Wednesday, February 06, 2008 3:57 PM
To: Eldridge, John
Subject: Gulfco UAO Notice of Intent to Comply

John:

Based upon your conversations with EPA regarding Parker Drilling's difficulty in joining the UAO for RI/FS and your efforts to be in compliance with the UAO, EPA recommends that you send a notice to comply with the UAO for RI/FS letter detailing Parker's efforts in contacting the existing PRP group and participating in the ongoing RI/FS that the PRP group has been conducting for the past two years. Based upon information provided in the letter, EPA can make a determination if Parker has been diligent in its attempt to comply with the UAO.

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1445 Ross Avenue

Dallas, TX 75202
phone: (214) 665-2157
fax: (214) 665-6460
nann.barbara@epa.gov

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